

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

IN RE:

THERESIA ANN MARSHALL

NO. 25-50626 KMS

**MOTION TO APPROVE AGREEMENT RELATING TO
RELIEF FROM THE AUTOMATIC STAY**

Comes now Keesler Federal Credit Union, by and through its counsel of record, Byrd & Wisner, and files this its Motion to Approve Agreement relating to Relief from Automatic Stay, and in support of same would show unto the Court the following, to-wit:

I

This Court has jurisdiction over the parties and the subject matter pursuant to 28 USC Section 1334. This Motion is a core proceeding pursuant to 28 USC Section 157(b)(2)(A),(G).

II

The instant case is a proceeding pursuant to Chapter 13 of the Bankruptcy Code.

III

The Movant and Debtor have reached an agreement providing for, inter alia, relief from the automatic stay provisions of Section 362 as to the Movant, Keesler Federal Credit Union. A copy of the agreement, reflected in the form of an Agreed Order, is attached hereto as Exhibit "A".

IV

Pursuant to Rule 9014(b) and 7004(b)(9) of the Federal Rules of Bankruptcy Procedure, this Motion to Approve is served upon all necessary parties, and all necessary parties have approved the Agreement in the form of the Agreed Order attached hereto

WHEREFORE, premises considered, the Movant herein, would pray that this Court enter its Order granting Movant's Motion to Approve Agreement by approving and entering the Agreed Order attached hereto, and the Movant prays for such other and further relief as is just and proper

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in the premises.

Respectfully submitted,

KEESLER FEDERAL CREDIT UNION

BY: BYRD & WISER

BY:


ROBERT ALAN BYRD, MSB#7651
EMAIL: rab@byrdwiser.com

CERTIFICATE

I, ROBERT ALAN BYRD, Attorney for Keesler Federal Credit Union, do hereby certify that I have this date transmitted via Electronic Case Filing, as it appears on this date in the court registered e-filers of CM/ECF and/or via U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing Motion to Approve Agreement relating to Relief from Automatic Stay to the following:

Thomas C. Rollins, Jr., Attorney for Debtor, at trollins@therollinsfirm.com

Warren Cuntz, Jr., Trustee, at wcuntzcourt@gport13.com

Office of the U.S. Trustee, at USTPRegion05.JA.ECF@usdoj.gov

This the 16th day of May, 2025.


ROBERT ALAN BYRD